

FILED - USDC -NH
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

Michael Sean Speight

V.

Civil No. **1:24-cv-00055**
Chief Judge Landya B. McCafferty

Amanda Kaelblein
Michael Kaelblein
Nancy Kaelblein
George Phelan(Professional, individual capacity)
Eric Stephanie(Professional, individual capacity)

**MOTION FOR DEFAULT JUDGMENT AGAINST AMANDA KAELEBLEIN
AND GRANT ALL RELIEF REQUESTED IN COMPLAINT**

The plaintiff request under Rule 55 -Default judgment be entered in against Amanda Kaelblein for failure to plead or defend against the complaint. This defendant is ignoring the Court proceedings because she has no defense to apply to the allegations against her.

1. Amanda Kaelblein was served twice with this complaint, once in Woburn Probate Court in Massachusetts on March 12, 2024, And once again on April 24,2024 by Middlesex Sheriff's Office (docketed)
2. See Exhibit 1, Transcripts March 12, 2024
 - a. Page 3 lines 3-7 MS. PADILLA: No, Father has presented some documents today. Mother has copies of everything. He appears to have filed some sort of civil litigation in New Hampshire. I believe it was filed this month—no, I'm sorry, in February, like around the 24th. It has not been heard yet.
 - b. Page 7 lines 3-8 MS.KAELBLEIN: I've had frivolous cases filed on me after every single court hearing that he and I have had. Theres always a new open case. And like I said, hes now suing my mother and my father, me the DOR lawyerfrom Massachusetts; I believe he's also – he's against the state of Massachusetts, which I believe is closed.
 - c. The defendant has known about this complaint for over 90 days, and she has not answered because all of her manipulating the Courts to keep V.S. away from the plaintiff has finally caught up with her.

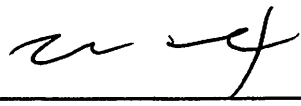
- d. The plaintiff filed a preliminary injunction with this Court with some of the evidence he has. To make this go to trial is a waste of Court resources.
- e. The plaintiff has played a lawyer at the begging of this , missed at least 20 days of work between denied restraining order motions, probate courts (the plaintiff makes over 100 per hour as a union bricklayer) , See exhibit b from plaintiffs therapist—the emotion and mental infliction the plaintiff has suffered through being separated with V.S.
- f. There should also be a change of custody, as Amanda Kaelblein does not have the child's best interest at heart. Any parent who has to fight this hard to see his or her child. is with the wrong parent. For she continues her unhealthy behavior by ignoring this complaint, someone with nothing to hide would answer.
- g. The plaintiff has Constitutional rights as a parent, and V.S. has Constitutional rights as a child that should be protected and enforced by this Honorable Court.

- h. Last, The plaintiff does not know how much emotional and mental abuse this has caused V.S The plaintiff suffered, so we know the child has suffered too.
- i. Amanda Kaelblein was made aware of this motion being filed on May 30,2024. Docket reflects the plaintiff had Middlesex Sheriffs Office serve her.

For the following reasons this motion should be granted , and relief of change of custody of minor child V.S and the sum of a 100,000. Should be granted.The defendant should not be allowed to manipulate the system anymore.

Or in alternative enter the default judgment and set a date for damages, and hearing on change of custody.

Date 6/12/24



Michael Speight
!00 Main Street #106
Pembroke, NH 03275

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**MEMORANDUM OF LAW TO SUPPORT MOTION FOR DEFAULT
JUDGMENT AGAINST AMANDA KAEUBLEIN AND GRANT ALL RELIEF
REQUESTED IN COMPLAINT**

Rule 55. Default; Default Judgment

(a) Entering a Default. When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default.

(1) *By the Clerk.* If the plaintiff's claim is for a sum certain or a sum that can be made certain by computation, the clerk—on the plaintiff's request, with an affidavit showing the amount due—must enter judgment for that amount and costs against a defendant who has been defaulted for not appearing and who is neither a minor nor an incompetent person.

The Court may look at the plaintiff's preliminary injunction for evidence against this defendant.

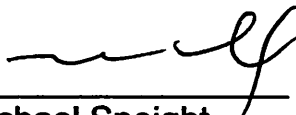
The plaintiff requests the relief requested in the motion or a hearing on damages for the emotional and mental infliction caused by the defendant, the defendant has failed to plead or otherwise defend.

The plaintiff request this Court to enter default judgment and

For the following reasons in the motion should be granted , and relief of change of custody of minor child V.S and the sum of a 100,000. Should be granted. .

Or in alternative enter the default judgment and set a date for damages, and hearing on change of custody.

Date 6/12/24



Michael Speight
100 Main street #106
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**AFFIDAVIT IN SUPPORT MOTION FOR DEFAULT JUDGMENT
AGAINST AMANDA KAEUBLEIN AND GRANT ALL RELIEF
REQUESTED IN COMPLAINT**

I swear under the pains and penalties of perjury, all information is true and correct to the best of my knowledge .

Amanda Kaelblein was notified of this motion on May 30,2024, by
Middlesex Sheriff's Office docket reflects

Date 6/7/24

Michael Speight
Michael Speight
100 Main Street #106
Pembroke, NH 03275

State of NH

County of Merrimack

The foregoing instrument was acknowledged this 6/7/24, 2024

By [Signature] -

Notary public _____

My commission expires 5/6/25

CHRISTOPHER D. LACROIX
Justice of the Peace - New Hampshire
My Commission Expires May 6, 2025



THE
NEW
STANDARD
DISC

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[illegible]

SECRET

NATIONAL DEFENSE ACADEMY
 1115 NORTH 4TH STREET
 ARLINGTON, VIRGINIA 22204-4102

